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DATE: June 12, 1991

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FROM: M.L. Johnson, *MLJ* Spill Response and Reporting, Bldg. 130C, X5033

SUBJECT: MEETING MINUTES ON GUIDANCE DOCUMENT FOR HANDLING INTERNALLY REPORTABLE PETROLEUM SPILLS- MLJ-008-91

A meeting was held on June 6, 1991, to review the draft guidance document for handling internally reportable petroleum spills (less than 10 gallons of petroleum product including gasoline, diesel, motor oil, and hydraulic oil). During the meeting, General Laboratory personnel explained why TCLP should not be performed on petroleum products and how absorbent material could interfere with the testing process. In addition, the Environmental Protection Agency (EPA) has provided direction that TCLP was not intended to be applied to oil or solvent matrices and cannot be used to demonstrate that these materials are nonhazardous. EPA has recommended that facilities treat these materials as hazardous.

A decision was made at this meeting to forgo analyzing cleanup materials from petroleum spills. The draft guidance document will be revised to eliminate the analytical steps and to manage the cleanup material from petroleum spills as hazardous waste. Management of spills of new oil will also be addressed. A separate meeting will be held to review the packaging and labeling requirements for gasoline spills and radioactive/nonradioactive petroleum spills.

The revised draft guidance document will be issued for review prior to implementation. If you have any additional comments or questions please feel free to contact me.

During the interim, a 90-day accumulation area for cleanup material from petroleum spills will be established. Until a resolution on packaging for cleanup material from gasoline spills is reached, this material will be collected in plastic bags and will be stored north of Building 331.

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ADMIN RECORD

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